

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:19-CV-767-ECM
	)	
HYUNDAI MOTOR	)	
MANUFACTURING, ALABAMA,	)	
LLC; HYUNDAI ENG AMERICA,	)	
INC.; and DYNAMIC SECURITY,	)	
INC.	)	
	)	
Defendants.	)	

---

**PLAINTIFF'S WITNESS LIST**

**Exhibit D – Deposition of Hyundai ENG America's  
30(b)(6) Deponent (Cassandra Williams)**

---

Case	Key, Davita
Issue Code	Depo Designations

WILLIAMS, CASSANDRA 9/6/22 VOL 1		
1	007:19 - 007:21	<p>007:19 CASSANDRA WILLIAMS,</p> <p>20 being first duly sworn, was examined</p> <p>21 and testified as follows:</p>
2	008:03 - 008:05	<p>008:03 Q. Will you please state your full legal name</p> <p>04 for the record.</p> <p>05 A. Cassandra Williams.</p>
3	014:06 - 014:23	<p>014:06 What does HEA, Hyundai Engineering</p> <p>07 America, do? What's its -- what's the company's</p> <p>08 purpose?</p> <p>09 A. I think in the beginning, based on what</p> <p>10 I've been told, it was a -- maybe a construction</p> <p>11 company. And then it branched out, providing</p> <p>12 different services.</p> <p>13 Q. What services does HEA provide?</p> <p>14 A. At HMMA?</p> <p>15 Q. Sure.</p> <p>16 A. Okay. At HMMA they provide -- or they</p> <p>17 manage the security contract, the janitorial</p> <p>18 contracts, landscaping contract, and some of the</p> <p>19 general construction contracts.</p> <p>20 Q. Outside of what it does at HMMA, what does</p> <p>21 HEA do? What services does it provide?</p> <p>22 A. I'm only familiar with some of the</p> <p>23 services it provides at the Kia facility.</p>
4	015:01 - 015:16	<p>015:01 Q. Okay. And what services does HEA provide</p> <p>02 at the Kia facility?</p> <p>03 A. Facilities maintenance and, if I'm not</p> <p>04 mistaken, janitorial.</p> <p>05 Q. Where does HEA have locations?</p> <p>06 A. In West Point, Georgia. And our corporate</p> <p>07 office in the United States is in Irvine,</p> <p>08 California. And, of course, Montgomery, Alabama.</p> <p>09 Q. What is the address for the HEA location</p> <p>10 in Montgomery, Alabama?</p> <p>11 A. We operate out of 700 Hyundai Boulevard,</p> <p>12 Montgomery, Alabama.</p>

		<p>13 Q. Does HEA operate out of the HMMA campus?</p> <p>14 A. Yes. That's at 700 Hyundai Boulevard.</p> <p>15 Q. Who owns the building in which HEA does</p> <p>16 its Alabama operations?</p>
5	015:20 - 015:20	015:20 A. HMMA.
6	016:17 - 016:23	<p>016:17 Q. How many employees does HEA have?</p> <p>18 A. At HMMA?</p> <p>19 Q. First of all, company-wide.</p> <p>20 A. I don't know.</p> <p>21 Q. How many employees does HEA have in</p> <p>22 Alabama?</p> <p>23 A. In the group that I am assigned to, five.</p>
7	017:01 - 017:23	<p>017:01 Q. What group are you assigned to?</p> <p>02 A. I don't -- I'm sorry. Facilities</p> <p>03 management.</p> <p>04 Q. Who are the five people in your facilities</p> <p>05 management group?</p> <p>06 A. My project manager, and I'm probably about</p> <p>07 to murder his first name. But I'll -- rather than</p> <p>08 say it, I'll spell his first name. K-i, middle</p> <p>09 name Sung, S-u-n-g, last name Kim, K-i-m.</p> <p>10 Q. All right. And what is Mr. Kim's -- and</p> <p>11 you said he's the facilities manager?</p> <p>12 A. He's the project manager.</p> <p>13 Q. Okay.</p> <p>14 A. And I have three other counterparts:</p> <p>15 Robert Madison and Yoomi, Y-o-o-m-i, Kim, and</p> <p>16 Sang, S-a-n-g B-e-o-m Lee.</p> <p>17 Q. All right. And what are Mr. Madison,</p> <p>18 Mr. Kim, and Mr. Lee's job titles?</p> <p>19 A. Madison -- he manages the landscaping</p> <p>20 contract. Yoomi Lea -- I'm sorry -- Yoomi Kim --</p> <p>21 Q. Yes.</p> <p>22 A. She manages janitorial.</p> <p>23 Q. And Mr. Lee?</p>
8	018:01 - 018:07	<p>018:01 A. General construction.</p> <p>02 Q. The people that you've identified so</p> <p>03 far -- Mr. Kim, Ms. Kim, Mr. Madison, and</p> <p>04 Mr. Lee -- where do they keep an office?</p> <p>05 A. It's on Hyundai's -- HMMA's campus in the</p> <p>06 facilities engineering building also referred to</p>

		07 as central energy building.
9	018:13 - 018:23	<p>018:13 Q. All right. I'm going to show you what I'm</p> <p>14 marking as Exhibit 62 to your deposition, which is</p> <p>15 Bates number HEA 167.</p> <p>16 Have you seen Plaintiff's Exhibit 62</p> <p>17 before?</p> <p>18 A. I have.</p> <p>19 Q. What is this document?</p> <p>20 A. It's our org chart for HEA.</p> <p>21 Q. Okay. At the top where it says "HEA AL FM</p> <p>22 Organization (July 2017)," what does -- does the</p> <p>23 "AL" stand for Alabama?</p>
10	019:01 - 019:20	<p>019:01 A. Yes.</p> <p>02 Q. And is "FM" facilities maintenance?</p> <p>03 A. Yes.</p> <p>04 Q. And is this what the organization was in</p> <p>05 July of 2017?</p> <p>06 A. I can only speak for security. I have --</p> <p>07 as far as the head count or the --</p> <p>08 Q. I'm just saying the way things are</p> <p>09 organized, not necessarily the numbers of</p> <p>10 employees.</p> <p>11 But looking at this organization, does</p> <p>12 Plaintiff's Exhibit 62 accurately reflect the way</p> <p>13 the HEA Alabama facility management group was</p> <p>14 organized in July of 2017?</p> <p>15 A. I can't be sure of the janitorial and</p> <p>16 landscape because there was a person with HEA that</p> <p>17 was assigned that was managing both those</p> <p>18 positions at the time because of manpower</p> <p>19 shortage, but I can't be sure when he left the</p> <p>20 company.</p>
11	020:13 - 020:23	<p>020:13 Q. Looking at the number of subcontractors</p> <p>14 that are reflected on this document, we see for</p> <p>15 the security contract it says "Manpower: 55."</p> <p>16 What does it mean, "manpower"?</p> <p>17 A. That was the allotted manpower for</p> <p>18 security at HMMA.</p> <p>19 Q. Who made the decision that that was the</p> <p>20 allotted manpower?</p> <p>21 A. HMMA general affairs department.</p> <p>22 Q. Okay. And where it says three shifts,</p>

		23 what does that mean?
12	021:01 - 021:06	<p>021:01 A. That manpower is spread over three shifts.</p> <p>02 Q. What are the hours for the shifts?</p> <p>03 A. For securities?</p> <p>04 Q. Yes, ma'am.</p> <p>05 A. Just for security, as far as manning</p> <p>06 post --</p>
13	021:13 - 021:23	<p>021:13 A. Well -- and because there are different</p> <p>14 job responsibilities, the time may differ.</p> <p>15 Q. Well, on the organizational chart, where</p> <p>16 it says "three shifts," what does that mean?</p> <p>17 A. Three security posting shifts.</p> <p>18 Q. Okay. And what are those shifts?</p> <p>19 A. 0545 to 1345. That excludes their</p> <p>20 30 minutes briefing time. That's first shift.</p> <p>21 Second shift is 1345 to 2145. That also</p> <p>22 excludes their briefing time.</p> <p>23 Third shift, 2145 to 0545, excluding their</p>
14	022:01 - 022:22	<p>022:01 30 minutes briefing time.</p> <p>02 Q. Where do the shift hours come from?</p> <p>03 A. They were --</p> <p>04 Q. Who sets those?</p> <p>05 A. They were established by HMMA.</p> <p>06 Q. To whom does the project manager report?</p> <p>07 A. To the general affairs HOD and coordinator</p> <p>08 and perhaps even the president and others.</p> <p>09 Q. What does "HOD" stand for?</p> <p>10 A. Head of department.</p> <p>11 Q. Where does the general affairs and HOD</p> <p>12 keep an office?</p> <p>13 A. The administrative building.</p> <p>14 Q. Is that -- is the general affairs and</p> <p>15 HOD -- is that an HEA person, or is that an HMMA</p> <p>16 person?</p> <p>17 A. HMMA.</p> <p>18 Q. And when you said that the project manager</p> <p>19 reports not only to the general affairs and HOD</p> <p>20 but the president and others, the president of</p> <p>21 what?</p> <p>22 A. HMMA.</p>
15	023:18 - 023:20	<p>023:18 Q. Do you keep a list of who is working on</p> <p>19 the security subcontract?</p>

		20	A. It's in HMMA's badge database.
16	024:02 - 024:04	024:02	Q. And what information is kept in the HMMA
		03	badge database concerning the security
		04	subcontractors?
17	024:06 - 024:10	024:06	A. Their name, date of birth, driver's
		07	license information.
		08	Q. Do you know on those badges if it
		09	identifies the employer for the subcontractor?
		10	A. It does.
18	024:12 - 024:15	024:12	Q. What does it say?
		13	A. For security it says "security."
		14	Q. How about for mail room?
		15	A. It says "security."
19	029:06 - 029:20	029:06	Q. What policy or policies does HEA have that
		07	relate to employment discrimination?
		08	A. I don't know.
		09	Q. Have you received any training from HEA
		10	about avoiding employment discrimination in your
		11	actions or decisions?
		12	A. I have not.
		13	Q. Is there a designated person for HEA to
		14	receive complaints of discrimination or
		15	harassment?
		16	A. As related to security?
		17	Q. Sure.
		18	A. I don't know whether it would be directed
		19	to me, my project manager, or our California
		20	office.
20	031:04 - 031:12	031:04	Q. Do you know who at HEA is designated to
		05	receive EEOC charges or charges of discrimination?
		06	A. I don't.
		07	Q. Does HEA have any type of discriminatory
		08	policy?
		09	A. Only in our handbook.
		10	Q. And what forms of discipline does it
		11	permit?
		12	A. At this point I honestly can't say.
21	031:16 - 031:23	031:16	Q. Can you make any decisions relating to
		17	hiring or firing?
		18	A. HEA employees?
		19	Q. For anyone.

		<p>20 A. Not firing, no.</p> <p>21 Q. What about hiring?</p> <p>22 A. I can only make recommendations.</p> <p>23 Q. To whom?</p>
22	032:01 - 032:16	<p>032:01 A. The security company.</p> <p>02 Q. What type of recommendations can you make?</p> <p>03 A. If they bring an applicant's information</p> <p>04 or application package to me, I can, once I</p> <p>05 receive it, decide whether or not their</p> <p>06 qualification meets our criteria and state whether</p> <p>07 or not we would like to move forward with them.</p> <p>08 It's just -- like I said, it's just a</p> <p>09 recommendation. They can do whatever they want to</p> <p>10 do, but I voice my opinion.</p> <p>11 Q. And you would voice your opinion to the</p> <p>12 security company providing the labor; correct?</p> <p>13 A. Their -- if they have one, their account</p> <p>14 manager.</p> <p>15 Q. Okay. Who was the account manager for</p> <p>16 Dynamic Security in 2018?</p>
23	032:18 - 032:23	<p>032:18 Q. 2017. I'm sorry.</p> <p>19 A. At what point?</p> <p>20 Q. At any point.</p> <p>21 Was there more than one?</p> <p>22 A. I think so.</p> <p>23 Q. Okay. Who are the ones you're thinking</p>
24	033:01 - 033:05	<p>033:01 of?</p> <p>02 A. B.J. McCullough, Neal McMann, Gloria</p> <p>03 Robinson, and Malinda Williams.</p> <p>04 Q. Do you know why Ms. Robinson is no longer</p> <p>05 an account manager at HMMA?</p>
25	033:08 - 033:23	<p>033:08 A. She was relocated -- I'm sorry.</p> <p>09 Q. It's okay.</p> <p>10 A. She requested to step down from that</p> <p>11 position.</p> <p>12 Q. What do you know about that?</p> <p>13 A. She told her manager -- and I don't know</p> <p>14 what his position was -- that she wanted to step</p> <p>15 down, and she recommended someone else to take her</p> <p>16 position.</p> <p>17 Q. How did you come to have this knowledge?</p> <p>18 A. She told me as well as her</p>

		<p>19 then-supervisor.</p> <p>20 Q. Did Ms. Robinson tell you why she was</p> <p>21 requesting to step down?</p> <p>22 A. She said she was getting burned out.</p> <p>23 Q. How long had she been there?</p>
26	034:01 - 034:10	<p>034:01 A. At HMMA?</p> <p>02 Q. Yes, ma'am.</p> <p>03 A. Maybe 2007. I'm not sure.</p> <p>04 Q. And did she tell you why she was being</p> <p>05 burned out or what was causing her to be burned</p> <p>06 out?</p> <p>07 A. She did not.</p> <p>08 Q. Did you have the ability or the power to</p> <p>09 request that somebody from Dynamic Security's work</p> <p>10 assignment at HMMA be terminated?</p>
27	034:13 - 034:22	<p>034:13 A. Their work assignment, yes, at HMMA.</p> <p>14 Q. Tell me about that, that authority that</p> <p>15 you had. What was your ability?</p> <p>16 A. If, for whatever reason, the person's</p> <p>17 service was not up to par or if they violated a</p> <p>18 policy, which includes criminal or just a basic</p> <p>19 policy, I could request that they be reassigned.</p> <p>20 Q. Could anyone at HMMA request that the</p> <p>21 services of one of the Dynamic Security employees</p> <p>22 be terminated or that they be reassigned?</p>
28	035:01 - 035:03	<p>035:01 Q. In other words, could HMMA say, "Hey, I</p> <p>02 want this person removed from working on our</p> <p>03 property"?</p>
29	035:05 - 035:10	<p>035:05 A. Directly to me or to the security company?</p> <p>06 Q. Either.</p> <p>07 A. Not to the security company, no.</p> <p>08 Q. Could they make that -- could HMMA request</p> <p>09 to you that somebody from Dynamic Security no</p> <p>10 longer be assigned to work on the HMMA property?</p>
30	035:13 - 035:13	<p>035:13 A. They could if they chose to.</p>
31	035:18 - 035:23	<p>035:18 Q. You said that one of the reasons that you</p> <p>19 could request somebody's services at HMMA be ended</p> <p>20 or they be reassigned would be violation of</p> <p>21 policy.</p> <p>22 Whose policies?</p> <p>23 A. HMMA's policies.</p>



32	036:01 - 036:02	036:01 Q. What HMMA policies applied to people 02 placed on the property through Dynamic Security?
33	036:04 - 036:06	036:04 A. Repeat. 05 Q. Sure. What policies applied to the 06 Dynamic Security placements?
34	036:09 - 036:23	036:09 A. (No response.) 10 Q. What policies are you talking about? You 11 said -- 12 A. Violation -- I mean, which it -- it will 13 not just include securities but any contractor 14 violates. So are you asking me what policies they 15 could -- 16 Q. Yes. 17 A. -- be removed on? 18 Q. Yes, ma'am. 19 A. Which is -- some that come to mind: 20 violating their badge policy, their workplace 21 violence policy, their sexual harassment policy, 22 criminal activity, drug screen violation policy, 23 weapons policy, alcohol policy. And all three of
35	037:01 - 037:05	037:01 those -- those last three are one -- they work 02 together. Those are the only things -- ones -- 03 major ones I can think of right now. 04 Q. How are the people working on the security 05 contract made aware of these HMMA's policies?
36	037:07 - 037:12	037:07 A. They are provided to me, and I communicate 08 them to their supervisors, and their supervisors 09 will communicate it to them. 10 Q. Would it be fair to say, then, that the 11 employees working under the security contract are 12 subject to the HMMA policies?
37	037:15 - 037:15	037:15 A. They are.
38	038:01 - 038:23	038:01 Q. I'm marking as Plaintiff's Exhibit 63 02 HEA 163 through 166, which is a document that says 03 "Hyundai Eng America, Inc., Appearance Standards 04 For Security Contractors." I'm also going to show 05 you what's been previously marked as Plaintiff's 06 Exhibit 9, which is HEA 1 through 3, Appearance 07 Standards for Security Personnel." 08 Have you seen these two exhibits before? 09 A. I have.

		<p>10 Q. Looking at Plaintiff's Exhibit 63, we see</p> <p>11 at the bottom left corner there's some page</p> <p>12 numbers. There's like one, two, three, and four.</p> <p>13 What does this reference? Where did this</p> <p>14 come from?</p> <p>15 A. The document?</p> <p>16 Q. Yes, ma'am.</p> <p>17 A. I drafted it.</p> <p>18 Q. When did you draft Plaintiff's Exhibit 63?</p> <p>19 A. I -- I don't remember. I may -- I -- I</p> <p>20 don't remember. It's just modifications of</p> <p>21 Exhibit 9.</p> <p>22 Q. Okay. So Exhibit 9 would be the -- in</p> <p>23 terms of time, Exhibit 9 predated Exhibit 63?</p>
39	039:01 - 039:22	<p>039:01 A. It did.</p> <p>02 Q. Do you know when Plaintiff's Exhibit 63</p> <p>03 would have replaced Plaintiff's Exhibit 9?</p> <p>04 A. A date? No, I don't.</p> <p>05 Q. Which of these two exhibits, if any, apply</p> <p>06 to Davita Key?</p> <p>07 A. Both.</p> <p>08 Q. Were both of these in place at the same</p> <p>09 time?</p> <p>10 A. They were not.</p> <p>11 Q. Which of these two documents was in place</p> <p>12 during Ms. Key's employment?</p> <p>13 A. Exhibit 9.</p> <p>14 Q. Okay. What is the purpose of Exhibit 9?</p> <p>15 A. It's an appearance standards guideline</p> <p>16 that the security personnel are to follow.</p> <p>17 Q. Who set these as the appearance standards?</p> <p>18 A. Initially or this particular document?</p> <p>19 Q. Initially.</p> <p>20 A. So the bulk of the content of this</p> <p>21 document was taken from an HMMA policy that was in</p> <p>22 place when I was hired on at HMMA.</p>
40	040:03 - 040:21	<p>040:03 What is your job at HEA? I think we've</p> <p>04 covered it through the organizational chart, but</p> <p>05 so we've got a clean area of your transcript to</p> <p>06 cite to, what's your job?</p> <p>07 A. I'm a manager in facilities management</p> <p>08 department overseeing the security contract.</p>

		<p>09 Q. And what are your dates of employment with</p> <p>10 HEA?</p> <p>11 A. September 1, 2010, to current.</p> <p>12 Q. And have you held the same job that entire</p> <p>13 time?</p> <p>14 A. With HEA?</p> <p>15 Q. Yes, ma'am.</p> <p>16 A. Yes.</p> <p>17 Q. So when you say the bulk of the content of</p> <p>18 Exhibit 9 was taken from an HMMA policy, when you</p> <p>19 started, that would have been a policy that was in</p> <p>20 place in 2010?</p> <p>21 A. It was.</p>
41	041:01 - 041:06	<p>041:01 Q. You go on.</p> <p>02 A. 2010 was not my first day of -- in</p> <p>03 September was not my first day of employment at</p> <p>04 HMMA.</p> <p>05 Q. When was your first day of employment at</p> <p>06 HMMA?</p>
42	041:20 - 041:23	<p>041:20 Q. (BY MS. LEONARD) When you said</p> <p>21 September 1, 2010, was not your first date of</p> <p>22 employment, what did you mean?</p> <p>23 A. With HEA.</p>
43	042:01 - 042:22	<p>042:01 Q. Okay. What was your first date of</p> <p>02 employment with HEA?</p> <p>03 A. It was May, and I don't know the exact</p> <p>04 date, of 2004.</p> <p>05 Q. Okay. So from 2004 to 2010, what did you</p> <p>06 do for HEA?</p> <p>07 A. I wasn't working for HEA at that time.</p> <p>08 Q. Who were you working for from 2004 to</p> <p>09 2010?</p> <p>10 A. 2004 to December 2006, I was working for</p> <p>11 DTA, known as Don Terry and Associates, Security.</p> <p>12 And from December 2006 until August 31, 2010, I</p> <p>13 was working for American Citadel Guard security.</p> <p>14 Q. Okay. So when did you first start</p> <p>15 performing work on HMMA campus?</p> <p>16 A. May 2004.</p> <p>17 Q. Okay. So when you say that the</p> <p>18 "Appearance Standards for Security Personnel"</p> <p>19 document was taken -- the bulk of the content was</p>

		<p>20 taken from an HMMA policy when you started working</p> <p>21 out there, the policy you're referring to, when</p> <p>22 was it in place, the HMMA policy?</p>
44	043:01 - 043:08	<p>043:01 A. It was in place when I started.</p> <p>02 Q. And that's where I'm trying to go.</p> <p>03 Are you saying when you started at the</p> <p>04 HMMA facility in 2004? When you started at one of</p> <p>05 those subsequent employers between 2004 and 2010?</p> <p>06 Are you talking about in 2010 with HEA?</p> <p>07 A. I started at HMMA in May 2004 with DTA,</p> <p>08 and it was in place at that time.</p>
45	044:03 - 044:05	<p>044:03 Q. Who made the decision that the "Appearance</p> <p>04 Standards for Security Personnel" would say that</p> <p>05 dreads or dreadlock hair style are prohibited?</p>
46	044:07 - 044:14	<p>044:07 A. Although HMMA's policy didn't specifically</p> <p>08 say dreads or dreadlocks, braids was noted, and</p> <p>09 the dreads were in the braids family. That's the</p> <p>10 way we interpreted it.</p> <p>11 Q. Okay. Did anyone from HMMA review the</p> <p>12 "Appearance Standards for Security Personnel" to</p> <p>13 ensure that it was consistent with what they</p> <p>14 wanted?</p>
47	044:18 - 044:18	<p>044:18 A. Not with me.</p>
48	045:05 - 045:16	<p>045:05 Q. Why are dreads or dreadlocks prohibited</p> <p>06 under Exhibit 9?</p> <p>07 A. My document?</p> <p>08 Q. Yes, ma'am.</p> <p>09 A. Keeping with HMMA's policy, I decided to</p> <p>10 continue it because for grooming and professional</p> <p>11 appearance, I didn't think they met those</p> <p>12 guidelines.</p> <p>13 Q. So based on your understanding of HMMA's</p> <p>14 policies, you felt that dreads or dreadlocks hair</p> <p>15 styles would be prohibited for people who would be</p> <p>16 in a visible uniformed position?</p>
49	045:19 - 045:23	<p>045:19 A. Every security person, regardless of</p> <p>20 position, are in a uniform.</p> <p>21 Q. But you felt the prohibition of dreads or</p> <p>22 dreadlocks was consistent or what was required</p> <p>23 under the HMMA policy?</p>

50	046:04 - 046:04	046:04 A. Yes.
51	046:17 - 046:23	<p>046:17 Q. Sure. Was anybody permitted to work under</p> <p>18 the security contract with dreads or dreadlocks?</p> <p>19 A. At what point?</p> <p>20 Q. At any point.</p> <p>21 A. Not prior to 2017.</p> <p>22 Q. After 2017 has anyone with dreads or</p> <p>23 dreadlocks been permitted to work under the</p>
52	047:01 - 047:23	<p>047:01 security contract?</p> <p>02 A. Yes.</p> <p>03 Q. Who would that be?</p> <p>04 A. One young lady. Her last name was Howard.</p> <p>05 I don't remember. But I wasn't a part of her</p> <p>06 hiring so...</p> <p>07 Another young lady. Her last name was</p> <p>08 Walton, I believe. She was allowed to wear dreads</p> <p>09 as long as they were styled in a different manner.</p> <p>10 Q. When was Ms. Walton permitted to wear</p> <p>11 dreads as long as they were styled in a certain</p> <p>12 manner?</p> <p>13 A. I believe she started maybe late 2017.</p> <p>14 Q. Why was she permitted to wear dreads?</p> <p>15 A. Because she agreed to style them in a</p> <p>16 different manner.</p> <p>17 Q. Who made the decision to allow her to wear</p> <p>18 dreads?</p> <p>19 A. Myself and -- I don't know -- I don't</p> <p>20 remember at the time whether it was Gloria</p> <p>21 Robinson or Malinda Williams.</p> <p>22 Q. At the time the decision was made to</p> <p>23 permit Ms. Walton to wear her hair in dreads as</p>
53	048:01 - 048:04	<p>048:01 long as they were styled in a certain manner, were</p> <p>02 you aware that Davita Key had made a complaint</p> <p>03 that she felt she was being discriminated against?</p> <p>04 A. I can't say because --</p>
54	048:07 - 048:16	<p>048:07 A. I can't say because I don't remember when</p> <p>08 Ms. Walton came to work there.</p> <p>09 Q. And we're going to go through some</p> <p>10 documents specific to Ms. Key in a little bit.</p> <p>11 But one of the things that we're going to see</p> <p>12 through those documents is basically upon her last</p> <p>13 day -- you know, on July 31, 2017 -- she was</p>

		<p>14 complaining about you and about the hair policy.</p> <p>15 When did you first become aware of those</p> <p>16 internal complaints?</p>
55	048:18 - 048:18	048:18 A. Her first day of work.
56	049:08 - 049:12	<p>049:08 Q. If Ms. Walton started in late 2017 and</p> <p>09 Ms. Key started on July 31, 2017, and it's your</p> <p>10 testimony that you're aware of her complaints</p> <p>11 about the prohibition of dreadlocks being</p> <p>12 discriminatory --</p>
57	049:14 - 049:17	<p>049:14 Q. -- on her first day of employment, would</p> <p>15 it be fair, then, to say that you're aware of</p> <p>16 Ms. Key's complaint by the time Ms. Walton</p> <p>17 started?</p>
58	049:19 - 049:23	<p>049:19 A. I don't know when Ms. Walton started, so I</p> <p>20 can't say yes or no.</p> <p>21 Q. Well, your testimony earlier was she</p> <p>22 started in late 2017. If that's true, you would</p> <p>23 agree, then, you would have to have been aware of</p>
59	050:01 - 050:02	<p>050:01 Ms. Key's complaint by the time Ms. Walton</p> <p>02 started?</p>
60	050:06 - 050:18	<p>050:06 A. I know her -- okay. Her verbal complaint,</p> <p>07 yes. I'm aware of that, yes.</p> <p>08 Q. How did Ms. Walton agree to style her</p> <p>09 hair?</p> <p>10 A. To she agreed to pull it back. And I</p> <p>11 can't -- I'm trying to visualize, but I can't.</p> <p>12 But it was pulled back in a much neater</p> <p>13 appearance, and she agreed to maintain that</p> <p>14 appearance.</p> <p>15 Q. And you said "much neater appearance."</p> <p>16 Neater than what?</p> <p>17 A. Than what it was on the day that she</p> <p>18 interviewed.</p>
61	052:01 - 052:03	<p>052:01 Q. Was Ms. Key working on the HMMA campus</p> <p>02 through a contractual agreement between HEA and</p> <p>03 HMMA?</p>
62	052:05 - 052:07	<p>052:05 A. The agreement was with Dynamic Security.</p> <p>06 Q. What relationship, if any, exists between</p> <p>07 HMMA and HEA?</p>
63	052:09 - 052:15	052:09 A. HEA is a subsidiary of HMMA.

		<p>10 Q. Okay. Do you know if there are any common</p> <p>11 owners among HMMA and HEA?</p> <p>12 A. I don't.</p> <p>13 Q. When you say "HEA is a subsidiary of</p> <p>14 HMMA," what does that mean?</p> <p>15 A. It's like an organization or --</p>
64	052:18 - 052:22	<p>052:18 THE WITNESS: Corporation, organization of</p> <p>19 another -- or entity of another company maybe?</p> <p>20 I'm just thinking off the top of my head.</p> <p>21 Q. (BY MS. LEONARD) Are there any common</p> <p>22 policies that HMMA and HEA have?</p>
65	053:06 - 053:23	<p>053:06 Q. Like, at HEA do you guys use or operate</p> <p>07 under any HMMA policies?</p> <p>08 A. The -- some of the same policies -- well,</p> <p>09 those same policies I repeated earlier in addition</p> <p>10 to others.</p> <p>11 Q. Okay. Can you think of any others beyond</p> <p>12 the ones you've already shared with me?</p> <p>13 A. Their PPE, which is personal protection.</p> <p>14 Parking policies. Badging policy. Those are</p> <p>15 the...</p> <p>16 Q. Are you aware of any contracts between HEA</p> <p>17 and HMMA?</p> <p>18 A. Currently?</p> <p>19 Q. Yes, ma'am.</p> <p>20 A. Yes.</p> <p>21 Q. What contract or contracts exist between</p> <p>22 the companies?</p> <p>23 A. We have a security contract and janitorial</p>
66	054:01 - 054:01	054:01 contract and landscaping.
67	054:17 - 054:23	<p>054:17 Was there a contractual relationship in</p> <p>18 2017?</p> <p>19 A. No.</p> <p>20 Q. What relationship, if any, existed between</p> <p>21 HEA and HMMA in 2017? Like, I guess where I'm</p> <p>22 trying to go is if there wasn't a contract, why</p> <p>23 was HEA -- why were you out on the HMMA property</p>
68	055:01 - 055:12	<p>055:01 doing anything in 2017?</p> <p>02 A. There was a scope of service that we were</p> <p>03 operating under.</p> <p>04 Q. And what does that mean?</p>

		<p>05 A. It outlined the work that HMMA wanted HEA</p> <p>06 to provide as far as security is concerned. I</p> <p>07 don't know about that other.</p> <p>08 Q. And what was that work?</p> <p>09 A. Provide security services.</p> <p>10 Q. And would you agree that the work that HEA</p> <p>11 was providing in terms of providing security</p> <p>12 services was for the benefit of HMMA?</p>
69	055:15 - 055:19	<p>055:15 A. Yes.</p> <p>16 Q. And did HMMA, through that scope of</p> <p>17 services agreement, empower you to act on its</p> <p>18 behalf to make contracts to provide security</p> <p>19 services on the HMMA property?</p>
70	055:22 - 055:23	<p>055:22 A. I would not say on their behalf. The</p> <p>23 contract would have been between HEA and the</p>
71	056:01 - 056:03	<p>056:01 security vendor.</p> <p>02 Q. And who was getting the benefit of the</p> <p>03 security services?</p>
72	056:06 - 056:09	<p>056:06 A. The services are being provided at HMMA's</p> <p>07 site.</p> <p>08 Q. And who is deriving the benefit -- or</p> <p>09 whose property is being secured?</p>
73	056:11 - 056:17	<p>056:11 A. HMMA's property.</p> <p>12 Q. Ms. Key worked in a mail room capacity.</p> <p>13 What scope of services agreement or</p> <p>14 contract or whatever -- where did that fall, mail</p> <p>15 room duties?</p> <p>16 A. Under the scope of work in the -- for the</p> <p>17 security.</p>
74	057:03 - 057:23	<p>057:03 Q. Were there any post orders applicable to</p> <p>04 Ms. Key's employment?</p> <p>05 A. There were.</p> <p>06 Q. Who drafted those?</p> <p>07 A. I transferred them from the information I</p> <p>08 received from HMMA as far as how the mail room was</p> <p>09 to be run.</p> <p>10 Q. What information did you receive from HMMA</p> <p>11 as to how the mail room was to be run?</p> <p>12 A. Basically the hours the mail room was to</p> <p>13 be open, when packages are to be delivered, mail</p> <p>14 processed, that sort of thing. Distributed, that</p>



		<p>15 sort of thing.</p> <p>16 Q. All right. When you say you transferred</p> <p>17 that info from something that you'd received from</p> <p>18 HMMA, what did you do to transfer that info?</p> <p>19 A. So I was told "This is what is expected of</p> <p>20 the mail room officer." And I can't remember at</p> <p>21 this time if there was something given to me in</p> <p>22 writing, but I also remember meeting with someone</p> <p>23 and just making general notes.</p>
75	058:01 - 058:09	<p>058:01 Q. Who did you meet with?</p> <p>02 A. Gosh. At that time I can't remember</p> <p>03 because positions have changed.</p> <p>04 Q. Was it someone from HMMA?</p> <p>05 A. Yes.</p> <p>06 Q. And when you said that you were told "This</p> <p>07 is what is expected of the mail room officer," who</p> <p>08 told you what was expected?</p> <p>09 A. It was someone --</p>
76	058:11 - 058:18	<p>058:11 A. -- in general affairs, but I can't say at</p> <p>12 this late date who it was.</p> <p>13 Q. And that would have been an HMMA employee</p> <p>14 in general affairs?</p> <p>15 A. Yes.</p> <p>16 Q. And you were being told what HMMA's</p> <p>17 expectations were for the mail room officer</p> <p>18 position?</p>
77	058:20 - 058:23	<p>058:20 A. Basically, yes.</p> <p>21 Q. Okay.</p> <p>22 A. We were following the same guidelines that</p> <p>23 HMMA's mail room person did.</p>
78	059:14 - 059:18	<p>059:14 What is Plaintiff's Exhibit 20?</p> <p>15 A. So this is a duties and responsibilities</p> <p>16 that was used when -- or -- then-Dynamic Security</p> <p>17 and any prior previous companies are hiring to</p> <p>18 fill that position.</p>
79	060:02 - 060:14	<p>060:02 Q. Okay. What role, if any, did you have in</p> <p>03 creating Plaintiff's Exhibit 20?</p> <p>04 A. I created it.</p> <p>05 Q. Okay. And what did you use to create</p> <p>06 Exhibit 20?</p> <p>07 A. Information from the scope and also</p>

		<p>08 information provided to me from whomever with HMMA</p> <p>09 discussed with me about the responsibilities of</p> <p>10 the person in the mail room.</p> <p>11 Q. All right. And when you said "information</p> <p>12 from the scope," are you referencing the scope of</p> <p>13 services agreement?</p> <p>14 A. I am.</p>
80	061:14 - 061:21	<p>061:14 Q. Where is the mail room?</p> <p>15 A. It's in the administrative building on the</p> <p>16 first floor at HMMA.</p> <p>17 Q. What else is in the administrative</p> <p>18 building?</p> <p>19 A. A ton of other offices.</p> <p>20 Q. Is that where most of the HMMA executives</p> <p>21 keep an office?</p>
81	061:23 - 061:23	<p>061:23 A. Quite a few do, but there are other</p>
82	062:01 - 062:06	<p>062:01 offices elsewhere.</p> <p>02 Q. And what do you mean "there are quite a</p> <p>03 few offices elsewhere"? Are you talking about the</p> <p>04 executives have offices other places or there are</p> <p>05 more offices in the building than just the</p> <p>06 executives or both?</p>
83	062:08 - 062:10	<p>062:08 A. Both.</p> <p>09 Q. Okay. What all do you understand to be in</p> <p>10 the administrative building?</p>
84	062:12 - 062:23	<p>062:12 A. The legal department -- you want me to</p> <p>13 name every department that comes to mind?</p> <p>14 Q. Yes, ma'am.</p> <p>15 A. The legal department, HR department,</p> <p>16 purchasing department, of course the mail room is</p> <p>17 there, finance, FTZ which is like an entity of</p> <p>18 purchasing, safety department, general affairs</p> <p>19 department, IT department, PR which is now a part</p> <p>20 of general affairs.</p> <p>21 There's a bank. Guardian Credit Union is</p> <p>22 there. They have a cafeteria there. I believe</p> <p>23 there's a quality department there. Team</p>
85	063:01 - 063:04	<p>063:01 relations department. That's all the ones that</p> <p>02 come to mind right now.</p> <p>03 Q. You mentioned there was a legal department</p> <p>04 in the building.</p>

86	063:13 - 063:23	<p>063:13 Q. All right. In Exhibit 20 we see that it</p> <p>14 says the mail room is staffed with two employees</p> <p>15 Monday through Friday and is open from 7:30 a.m.</p> <p>16 to 5:00 p.m. daily.</p> <p>17 Who set those hours?</p> <p>18 A. I changed the hours; and, of course, HMMA</p> <p>19 concurred with me. Initially it was 8:00 till</p> <p>20 4:45 p.m. I made adjustments as needs changed.</p> <p>21 Q. Did you have to get that adjustment</p> <p>22 approved by HMMA?</p> <p>23 A. I did speak to them about it.</p>
87	064:02 - 064:23	<p>064:02 Q. And why did you speak to HMMA about it?</p> <p>03 A. To let them know that I received</p> <p>04 complaints from team members that when they needed</p> <p>05 to send packages or mail, the mail room was</p> <p>06 closed. And, like I said, as HMMA grew and things</p> <p>07 changed, we needed the mail room to be opened.</p> <p>08 And I spoke to them about it to make sure they</p> <p>09 were in "agreement" in it.</p> <p>10 Q. What does the mail room do? I know the</p> <p>11 name makes it sound obvious, but I don't want to</p> <p>12 jump to conclusions.</p> <p>13 A. So they receive mail. They receive</p> <p>14 packages. They process mail and packages. They</p> <p>15 deliver mail. They deliver mail offsite to be --</p> <p>16 to the post office to be sent. Every now and</p> <p>17 again, they may have to take something to one of</p> <p>18 the local courier offices if a package that needed</p> <p>19 to go out was not picked up right away from one of</p> <p>20 the couriers. They reconcile shipping invoices.</p> <p>21 They do filing. And every now and again, they may</p> <p>22 be tasked with making bulk copies for an HMMA</p> <p>23 department.</p>
88	065:01 - 065:20	<p>065:01 Q. All right. When we go through Exhibit 9,</p> <p>02 under duties and responsibilities, it says one of</p> <p>03 the duties is to sort, deliver, and/or pick up</p> <p>04 interdepartmental and other mail within the</p> <p>05 facility.</p> <p>06 What does "interdepartmental" mean?</p> <p>07 A. You're going from office to office, and</p> <p>08 not every office but certain offices, to pick up</p> <p>09 mail.</p>

		<p>10 Q. But those would be HMMA offices?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And we see one of the other duties</p> <p>13 is assist employees with completing the required</p> <p>14 forms and arrange, coordinate package pick up with</p> <p>15 UPS, FedEx, and DHL services.</p> <p>16 What employees is this referencing?</p> <p>17 A. HMMA employees.</p> <p>18 Q. All right. And the last entry here says</p> <p>19 other duties as required by HMMA general affairs</p> <p>20 department.</p>
89	066:01 - 066:06	<p>066:01 Q. Why is that included in Plaintiff's</p> <p>02 Exhibit 9 -- or 20?</p> <p>03 A. Because they may be tasked with other</p> <p>04 duties.</p> <p>05 Q. And what does HMMA general affairs</p> <p>06 department do?</p>
90	066:09 - 066:11	<p>066:09 Q. That's kind of -- more of my question is:</p> <p>10 Why does the HMMA general affairs department get</p> <p>11 to assign other duties as required?</p>
91	066:13 - 066:16	<p>066:13 A. Because the general affairs department is</p> <p>14 the department that HEA supports.</p> <p>15 Q. Okay. So HEA is working for the general</p> <p>16 affairs department at HMMA?</p>
92	066:19 - 066:23	<p>066:19 A. We work with that department.</p> <p>20 Q. You used the word -- you said, "This is</p> <p>21 the department we support."</p> <p>22 A. Right.</p> <p>23 Q. What did you mean by "support"?</p>
93	067:01 - 067:13	<p>067:01 A. So the security contract and the</p> <p>02 janitorial contracts fall up under that</p> <p>03 department.</p> <p>04 Q. And that department is chosen to contract</p> <p>05 with HEA to make sure it has general -- or so it</p> <p>06 has janitorial services and security services on</p> <p>07 its property; correct?</p> <p>08 A. Yes.</p> <p>09 Q. And would it be fair to say, then, that</p> <p>10 the general affairs department has oversight over</p> <p>11 the work HEA has performed on the site? In other</p> <p>12 words, general affairs is making sure that HEA is</p>

		13 delivering what it's contracted for?
94	067:15 - 067:15	067:15 A. Yes.
95	068:07 - 068:19	<p>068:07 Q. (BY MS. LEONARD) What was the uniform</p> <p>08 that Ms. Key was supposed to wear when she was on</p> <p>09 HEA's property?</p> <p>10 A. That she would have worn?</p> <p>11 Q. Yes, ma'am.</p> <p>12 A. It would have been a shirt with "Hyundai</p> <p>13 Alabama" on it, just like the shirts that are sold</p> <p>14 in the gift shop.</p> <p>15 Q. All right. And whose gift shop are the</p> <p>16 shirts sold in?</p> <p>17 A. HMMA's gift shop.</p> <p>18 Q. Who made the decision that that was what</p> <p>19 Ms. Key was to wear?</p>
96	068:21 - 068:23	<p>068:21 A. HMMA general affairs authorized it.</p> <p>22 Q. Okay. When you say they "authorized it,"</p> <p>23 what do you mean?</p>
97	069:01 - 069:01	069:01 A. They made the selection.
98	069:07 - 069:14	<p>069:07 Q. I'm going to show you what's been marked</p> <p>08 as Exhibit 64, which is HEA 205.</p> <p>09 Does this photograph represent the shirt</p> <p>10 that Ms. Key would have been required to wear?</p> <p>11 A. Yes.</p> <p>12 Q. When we see on the shirt where it says</p> <p>13 "Hyundai Alabama," what does Hyundai Alabama refer</p> <p>14 to.</p>
99	069:17 - 069:18	<p>069:17 A. Hyundai Alabama.</p> <p>18 Q. What is Hyundai Alabama?</p>
100	069:20 - 069:23	<p>069:20 A. So this particular shirt, like I said, you</p> <p>21 can purchase out of the gift shop, so Hyundai</p> <p>22 Alabama would be HMMA.</p> <p>23 Q. And I notice today you're wearing a shirt</p>
101	070:01 - 070:10	<p>070:01 that's a little different. Yours is a black shirt</p> <p>02 with embroidery that says "Hyundai Engineering" --</p> <p>03 I can't read all of it, and I don't want to be</p> <p>04 staring too much at your shirt.</p> <p>05 But your shirt is badged with Hyundai</p> <p>06 Engineering America, Inc.?</p> <p>07 A. Yes.</p>

		<p>08 Q. Why would Ms. Key be wearing a shirt</p> <p>09 that's Hyundai Alabama versus a shirt like the one</p> <p>10 that you're wearing that says Hyundai Engineering?</p>
102	070:12 - 070:15	<p>070:12 A. She's not a Hyundai Engineering -- or was</p> <p>13 not a Hyundai Engineering employee.</p> <p>14 Q. Why would she wear any shirt that</p> <p>15 identifies her with the word "Hyundai"?</p>
103	070:19 - 070:19	<p>070:19 A. HMMA selected that shirt.</p>
104	072:03 - 072:16	<p>072:03 Q. Did you ever have the ability to recommend</p> <p>04 or request pay increases for anyone?</p> <p>05 A. Yes. Based on their bid.</p> <p>06 Q. Did you ever recommend specific pay</p> <p>07 increases for any employees of Dynamic Security?</p> <p>08 A. I believe so.</p> <p>09 Q. And why did you do that?</p> <p>10 A. Because I felt they were due and entitled</p> <p>11 to a raise based on their performance.</p> <p>12 Q. Was Latunya Howell one of the people you</p> <p>13 requested a raise for?</p> <p>14 A. I believe so.</p> <p>15 Q. And that would have been sometime in 2016?</p> <p>16 A. I don't remember when.</p>
105	072:19 - 072:20	<p>072:19 it first. This is Dynamic 289 through 293 that</p> <p>20 I'm marking as 65.</p>
106	073:21 - 073:23	<p>073:21 A. Okay. Yes, I did. December 2016.</p> <p>22 Q. All right. Do you know if that raise went</p> <p>23 into effect for Ms. Howell that you recommended?</p>
107	074:01 - 074:02	<p>074:01 A. According to the email, it went into</p> <p>02 effect on December 3.</p>
108	075:06 - 075:23	<p>075:06 Q. (BY MS. LEONARD) What supervision, if</p> <p>07 any, did you have over Ms. Howell?</p> <p>08 A. No direct supervision. I just kept close</p> <p>09 eye on the mail room.</p> <p>10 Q. What did you do to keep a close eye on the</p> <p>11 mail room?</p> <p>12 A. Just to check to make sure they were doing</p> <p>13 what they were supposed to be doing. If I</p> <p>14 received a complaint from an HMMA manager or team</p> <p>15 member stating that they had issues with packages</p> <p>16 being delivered or sent out, I would go down and</p> <p>17 check. Every now and again, I had to go and fill</p>

		<p>18 in the mail room myself if there was -- if they</p> <p>19 were short or no one in there at all.</p> <p>20 <b>Q. Who provided supervision to the mail room?</b></p> <p>21 A. Direct supervision would have been the</p> <p>22 first shift security supervisor followed by Gloria</p> <p>23 Robinson or whomever the account manager for the</p>
109	076:01 - 076:03	<p>076:01 security company.</p> <p>02 <b>Q. Did you provide indirect supervision for</b></p> <p>03 <b>the mail room?</b></p>
110	076:06 - 076:06	<p>076:06 A. As far as the duties, I did.</p>
111	076:20 - 076:21	<p>076:20 <b>Did anyone at HMMA or HEA object to</b></p> <p>21 <b>Ms. Key's appearance, her hairstyle?</b></p>
112	077:01 - 077:01	<p>077:01 A. Not that --</p>
113	077:07 - 077:12	<p>077:07 A. Okay. After -- prior to her being hired?</p> <p>08 After she was hired? Which? Or both?</p> <p>09 <b>Q. Any time. And I'll make the question</b></p> <p>10 <b>broader.</b></p> <p>11 <b>Are you aware of anyone, including</b></p> <p>12 <b>yourself, who objected to Ms. Key's appearance?</b></p>
114	077:14 - 077:19	<p>077:14 A. On the date that Ms. Key interviewed, I</p> <p>15 saw her hair. On the date that she started, I saw</p> <p>16 her hair, and at that time I made an objection</p> <p>17 about her hair.</p> <p>18 <b>Q. And so you made an objection after she had</b></p> <p>19 <b>started?</b></p>
115	077:22 - 077:23	<p>077:22 A. Yes. Because on the date of the</p> <p>23 interview, an agreement was made how she would</p>
116	078:01 - 078:23	<p>078:01 wear her hair.</p> <p>02 <b>Q. Were you present for Ms. Key's interview?</b></p> <p>03 A. I was not.</p> <p>04 <b>Q. Who interviewed her?</b></p> <p>05 A. Gloria Robinson and Maurice Chambliss.</p> <p>06 <b>Q. The day that Ms. Key interviewed, you said</b></p> <p>07 <b>you saw her hair.</b></p> <p>08 <b>How did you come to see her hair on the</b></p> <p>09 <b>date of her interview?</b></p> <p>10 A. I was asked to come into the conference</p> <p>11 room where they were interviewing her.</p> <p>12 <b>Q. Tell me about how that came to be.</b></p> <p>13 A. Gloria Robinson approached me at my desk</p>

		<p>14 and stated that they were interviewing someone for</p> <p>15 the mail room, that the young lady had dreads in</p> <p>16 her hair. She mentioned that she said that she</p> <p>17 could style it in a way that would be, like, more</p> <p>18 presentable, and she asked me if I would come in</p> <p>19 to look at her hair and how she was going to style</p> <p>20 it.</p> <p>21 <b>Q. So then what happened?</b></p> <p>22 A. I went in, I saw -- confirmed that, you</p> <p>23 know, she was wearing dreads. And she said that</p>
117	079:01 - 079:20	<p>079:01 she had a photo. I -- well, let me back up.</p> <p>02 I said, you know, "No, they're not</p> <p>03 permitted." And she said that "There's a way that</p> <p>04 I can style it." And she produced a photo on her</p> <p>05 phone.</p> <p>06 <b>Q. What did her hair look like in the</b></p> <p>07 <b>interview?</b></p> <p>08 A. All I can tell you it was in dreads.</p> <p>09 <b>Q. Long dreads? Short dreads? Medium? How</b></p> <p>10 <b>long were they?</b></p> <p>11 A. I believe they may have been shoulder</p> <p>12 length.</p> <p>13 <b>Q. Okay. Were they thin? Thick?</b></p> <p>14 A. Thick? As...</p> <p>15 <b>Q. Well, I'm just trying to get an idea --</b></p> <p>16 A. Okay. They weren't thick like Whoopi</p> <p>17 Goldberg dreads are but -- and I don't know how</p> <p>18 to -- as far as a size, I don't know what to say</p> <p>19 because I don't know. But I can just tell you</p> <p>20 they were in dreads. They were noticeable dreads.</p>
118	080:07 - 080:10	<p>080:07 <b>Q. Because you said she showed you a picture</b></p> <p>08 <b>that would be a lot more presentable.</b></p> <p>09 <b>What, if anything, was unpresentable about</b></p> <p>10 <b>her appearance in her interview?</b></p>
119	080:12 - 080:12	<p>080:12 A. Her hair was in dreads --</p>
120	080:14 - 080:14	<p>080:14 A. -- and they were a little --</p>
121	080:16 - 080:23	<p>080:16 A. -- frayed.</p> <p>17 <b>Q. And what do you mean by "frayed"?</b></p> <p>18 A. Like, they weren't neat and -- so I don't</p> <p>19 know if you've seen dreads when they're first</p> <p>20 done, but it's like, I guess, braids. They're</p>



		<p>21 pulled together and the ends and -- there's no</p> <p>22 wild hairs sticking out. So it was -- it was like</p> <p>23 that. So I could tell that she had had them for a</p>
122	081:01 - 081:08	<p>081:01 while. So they just didn't have that neat</p> <p>02 appearance like freshly done.</p> <p>03 Q. And the picture that she showed that you</p> <p>04 said was a lot more presentable, what did that</p> <p>05 look like?</p> <p>06 A. It was pulled back. And all I can tell</p> <p>07 you is I could no longer tell that they were --</p> <p>08 that they were dreads.</p>
123	081:18 - 081:23	<p>081:18 Q. Why, for purposes of holding this job in</p> <p>19 the mail room, are dreads unacceptable?</p> <p>20 A. Dreads aren't accepted for mail room,</p> <p>21 security post, regardless.</p> <p>22 Q. And that's my question: Why?</p> <p>23 A. Although I know some dreads once -- and I</p>
124	082:01 - 082:06	<p>082:01 don't know how they're done, but some dreads --</p> <p>02 they can be worn very neatly. But I know that</p> <p>03 some officers will not maintain their hair to keep</p> <p>04 that neat appearance. And just for appearance,</p> <p>05 professional grooming appearance, I wanted us to</p> <p>06 maintain the policy that no dreads are allowed.</p>
125	082:11 - 082:12	<p>082:11 Q. Why does the appearance of somebody in the</p> <p>12 mail room matter?</p>
126	082:19 - 082:20	<p>082:19 Q. (BY MS. LEONARD) Are people in the mail</p> <p>20 room visible?</p>
127	082:23 - 082:23	<p>082:23 A. Yes.</p>
128	083:01 - 083:04	<p>083:01 Q. And because of the visibility of the</p> <p>02 people working in the mail room, is that part of</p> <p>03 why there are appearance or grooming standards</p> <p>04 applicable to them?</p>
129	083:07 - 083:10	<p>083:07 A. They're a part of the security force.</p> <p>08 Q. That wasn't my question.</p> <p>09 My question is: Because of their</p> <p>10 visibility, is that why their appearance matters?</p>
130	083:16 - 083:20	<p>083:16 A. My answer is going to be the same.</p> <p>17 Q. Is the security force visible?</p> <p>18 A. Yes.</p> <p>19 Q. Why do you care what the security force</p>

		20 looks like?
131	083:23 - 083:23	083:23 A. Professional appearance.
132	084:01 - 084:09	084:01 Q. What happened after Ms. Key showed you the 02 photograph in her interview of how she could style 03 her dreads? 04 A. She showed it to Gloria Robinson. I don't 05 know if she had actually seen it prior to me and 06 we were looking at it again. And I said, "Okay. 07 That's fine" and walked out because the 08 understanding was that's the way she would style 09 her hair when she returned to work.
133	084:20 - 084:23	084:20 Q. Okay. Was Ms. Key visibility pregnant in 21 her interview? 22 A. I didn't look at her to say -- to notice 23 either way.
134	085:14 - 085:16	085:14 Q. Where do you keep an office at the HMMA 15 facility? 16 A. In the security building.
135	087:02 - 087:07	087:02 Q. Okay. And is there a big word on the wall 03 right when you come into the security building? 04 A. Yes. 05 Q. And what is that word? 06 A. Hyundai. 07 Q. And to whom does that word refer?
136	087:10 - 087:10	087:10 A. HMMA.
137	087:19 - 087:23	087:19 Q. (BY MS. LEONARD) We are back from a 20 break. 21 Is there anything in your testimony up to 22 this point that you would like to change or 23 clarify?
138	088:01 - 088:23	088:01 A. There is. 02 Q. Okay. What is that? 03 A. So I incorrectly -- when you asked what 04 was HEA's relationship to HMMA, I incorrectly 05 stated subsidiary. And we're actually a 06 contractor for HMMA. We just share the first part 07 of their name. 08 Q. When you said "subsidiary" before, what 09 did you mean? 10 A. (No response.)

		<p>11 Q. Let me rephrase.</p> <p>12 Why did you say "subsidiary" before?</p> <p>13 A. Just off the top of my head, that -- I</p> <p>14 didn't -- I couldn't think "contractor" at the</p> <p>15 time and I said "subsidiary." But all of our</p> <p>16 documents say "contractor," and I know that's</p> <p>17 exactly what we are, but I'm just -- just wasn't</p> <p>18 thinking.</p> <p>19 Q. And when you said earlier -- I think</p> <p>20 Mr. Miller had even asked you what you meant by</p> <p>21 "subsidiary," you said part of a company or a</p> <p>22 lesser part of a company, why, then, did you say</p> <p>23 that?</p>
139	089:02 - 089:15	<p>089:02 A. Because, again, goes back to -- one, I</p> <p>03 don't know the history of the company. Let me put</p> <p>04 it that way. I don't know the history of HEA</p> <p>05 versus HMMA. And, like I said, I was just trying</p> <p>06 to think what the relationship was, even though I</p> <p>07 know it's contract. And just to come up with a</p> <p>08 name, I said "subsidiary" right off the bat.</p> <p>09 Q. If there was not a contract in 2017, how</p> <p>10 could HEA be a contractor?</p> <p>11 A. We're going back to the scope of services</p> <p>12 where we've been asked to provide a service. The</p> <p>13 intent was there. It just was never accomplished</p> <p>14 at that -- during that year. Put it that way. Or</p> <p>15 during that period.</p>
140	092:19 - 092:23	<p>092:19 Q. In terms of the building where the mail</p> <p>20 room is located, the administration building, do</p> <p>21 VIPs ever visit that building, like the mayor or</p> <p>22 the governor?</p> <p>23 A. All the time.</p>
141	093:02 - 093:13	<p>093:02 Q. You said "all the time"?</p> <p>03 A. Yes.</p> <p>04 Q. How about foreign officers?</p> <p>05 A. Yes.</p> <p>06 Q. Is it important, then, that the appearance</p> <p>07 of people in the administration building promote</p> <p>08 the most professional appearance possible?</p> <p>09 A. It's important regardless of where they're</p> <p>10 posted.</p> <p>11 Q. But at least for people in the</p>

		<p>12 administration building, it's anticipated that</p> <p>13 they may cross the path of a VIP?</p>
142	093:15 - 093:22	<p>093:15 A. Yes. But they could cross the path at</p> <p>16 other locations as well because the VIPs will</p> <p>17 visit throughout the facility depending on, I</p> <p>18 guess, what their visit entails. But they just</p> <p>19 all the time are not just in the administrative</p> <p>20 building and don't go other places. They may take</p> <p>21 a tour. Depending on who the VIP is, they may end</p> <p>22 up at Gate 2 or even in the security building.</p>
143	094:02 - 094:23	<p>094:02 Q. Who made the decision that Ms. Key would</p> <p>03 no longer be working on HMMA's property?</p> <p>04 A. I don't know who made the initial decision</p> <p>05 with Dynamic. I know I echoed the decision in an</p> <p>06 email -- well, also verbally to Gloria and sent an</p> <p>07 email after.</p> <p>08 Q. When you say "echo," that implies</p> <p>09 something that was said to you before. Tell me</p> <p>10 what happened.</p> <p>11 A. So her second day of work, the decision</p> <p>12 was made to reassign her, and I backed that up</p> <p>13 because I just was not pleased with what was going</p> <p>14 on with her at the time.</p> <p>15 Q. Who made the decision to reassign Ms. Key?</p> <p>16 A. I echoed the reassignment. I don't know</p> <p>17 whether their intentions were going to be reassign</p> <p>18 or terminate her. But the termination, that's on</p> <p>19 them. But I asked also that she be removed from</p> <p>20 site.</p> <p>21 Q. To whom did you ask that she be removed?</p> <p>22 A. I put it in an email. I also mentioned it</p> <p>23 to Gloria Robinson.</p>
144	095:03 - 095:23	<p>095:03 A. So Gloria Robinson and I had a</p> <p>04 conversation after -- at some point after Ms. Key</p> <p>05 left the office, and it was followed up by an</p> <p>06 email.</p> <p>07 Q. On Ms. Key's second day of work, August 1,</p> <p>08 did Latunya Howell tell you that Ms. Key felt you</p> <p>09 and Ms. Robinson were discriminating against her?</p> <p>10 A. Yes, she did make that statement.</p> <p>11 Q. Tell me about that.</p> <p>12 A. So I think, if I remember correctly,</p>

		<p>13 Ms. Key had been in the office, and she went back</p> <p>14 to the mail room. Latunya Howell called my desk</p> <p>15 phone and told me that Ms. Key was asking her for</p> <p>16 an HMMA handbook, asking where she could get an</p> <p>17 HMMA handbook. She was talking about the -- I</p> <p>18 guess the hair policy, the appearance policy. And</p> <p>19 I guess at some point she mentioned she felt that</p> <p>20 she was discriminated against.</p> <p>21 Q. After Ms. Howell told you that, what, if</p> <p>22 anything, did you do?</p> <p>23 A. I told Ms. Howell that I was going to</p>
145	096:01 - 096:10	<p>096:01 notify Gloria Robinson and Lieutenant Maurice</p> <p>02 Chambliss, who was the first shift supervisor, to</p> <p>03 have her brought over and let Gloria address it.</p> <p>04 I mentioned it to Gloria, and I told her</p> <p>05 that -- basically what Ms. Thomas said, that she</p> <p>06 felt she was being discriminated against and she</p> <p>07 needed to get ahead of it.</p> <p>08 Q. Do you know why Latunya Howell came to you</p> <p>09 to tell you that Ms. Key was saying that she was</p> <p>10 feeling she had been discriminated against?</p>
146	096:14 - 096:22	<p>096:14 A. I can't answer why she came to me, no.</p> <p>15 Q. When you called Gloria Robinson, did she</p> <p>16 communicate in any way that she was already aware</p> <p>17 of Ms. Key's complaint?</p> <p>18 A. No. Because Gloria was sitting in the</p> <p>19 office at the time.</p> <p>20 Q. Do you know why Ms. Howell chose to come</p> <p>21 to you over Gloria Robinson?</p> <p>22 A. I don't know.</p>
147	099:06 - 099:14	<p>099:06 Q. Okay. The conversation that you mentioned</p> <p>07 that you had with Gloria Robinson about where it</p> <p>08 was determined that Ms. Key would need to be</p> <p>09 reassigned, was that before or after Ms. Howell</p> <p>10 let you know that Ms. Key had complained of</p> <p>11 discrimination?</p> <p>12 A. It was after.</p> <p>13 Q. How long did that conversation with</p> <p>14 Ms. Robinson last?</p>
148	099:17 - 099:23	<p>099:17 Q. Okay. Have you told me everything that</p> <p>18 you remember about that conversation?</p> <p>19 A. With Gloria?</p>

		<p>20 Q. Yes.</p> <p>21 A. I basically discussed with her all of the</p> <p>22 issues that we had encountered since Ms. Key came</p> <p>23 in on the 31st. Just revisited those issues.</p>
149	100:01 - 100:03	<p>100:01 Q. All right. I'm going to show you what's</p> <p>02 been previously marked as Plaintiff's Exhibit 41,</p> <p>03 which is Dynamic 85 through 87.</p>
150	100:10 - 100:18	<p>100:10 Q. Have you seen this email chain before?</p> <p>11 A. Yes.</p> <p>12 Q. I want to look at the email on the first</p> <p>13 page of the exhibit, which is on Bates number 85.</p> <p>14 It appears to be an email from you to Gloria</p> <p>15 Robinson dated Tuesday, August 1, 2017, 8:50 a.m.</p> <p>16 Is this the email that you referenced</p> <p>17 where you confirmed the conversation that you had</p> <p>18 with her about reassigning Ms. Key?</p>
151	100:21 - 100:21	<p>100:21 A. Yes.</p>
152	101:01 - 101:16	<p>101:01 Q. Who were you -- why were you sending this</p> <p>02 email?</p> <p>03 A. I was asked by someone to submit the</p> <p>04 email.</p> <p>05 Q. Do you remember who that was?</p> <p>06 A. I don't know exactly.</p> <p>07 Q. What was your intent in sending this email</p> <p>08 to Gloria Robinson, Ray Cureton, and Chris</p> <p>09 Hargrove?</p> <p>10 A. When Gloria and I discussed Ms. Key and,</p> <p>11 like I said, we echoed -- I echoed her decision to</p> <p>12 remove her from the site, I was asked to send an</p> <p>13 email to them, which is not something uncommon,</p> <p>14 that I had done in the past.</p> <p>15 Q. When did you first learn Ms. Key was</p> <p>16 pregnant?</p>
153	102:01 - 102:23	<p>102:01 Q. (BY MS. LEONARD) When did you first learn</p> <p>02 Ms. Key was pregnant?</p> <p>03 A. I believe the day before the 31st.</p> <p>04 Q. Okay. When you wrote in your email about</p> <p>05 Ms. Key "I foresee an issue down the road with</p> <p>06 this person," what issue did you foresee down the</p> <p>07 road?</p> <p>08 A. The compliance with her hair issue and</p>

		<p>09 being able to be properly trained in the mail</p> <p>10 room.</p> <p>11 Q. What was the issue with training?</p> <p>12 A. She was being difficult.</p> <p>13 Q. What was she being difficult about? How</p> <p>14 was she being difficult?</p> <p>15 A. As reported to me, instead of cooperating,</p> <p>16 trying to learn what is being taught her, she was</p> <p>17 continuously questioning Ms. Howell about HMMA's</p> <p>18 handbook, speaking of her hair, and then also</p> <p>19 questioning her about why she had reported that --</p> <p>20 she had mentioned that she was being discriminated</p> <p>21 against.</p> <p>22 Q. And what was the issue you foresaw down</p> <p>23 the road with compliance with her hair?</p>
154	103:01 - 103:23	<p>103:01 A. Well, she had not complained in the two or</p> <p>02 three weeks that -- following her interview, she</p> <p>03 did not comply -- was not in compliance when she</p> <p>04 arrived to work on the 31st and, of course, she</p> <p>05 was not in compliance on the 1st.</p> <p>06 Q. Weren't you willing to look past that?</p> <p>07 A. I was.</p> <p>08 Q. What made you not -- what made you stop</p> <p>09 being willing to look past that?</p> <p>10 A. Because I felt she had no intentions of</p> <p>11 changing her hair and also her -- just the way she</p> <p>12 was behaving -- well, I was told she was behaving</p> <p>13 in the mail room.</p> <p>14 Q. Who told you how she was behaving?</p> <p>15 A. Ms. Howell.</p> <p>16 Q. And what did she say that -- what did</p> <p>17 Ms. Howell tell you about the way she was behaving</p> <p>18 in the mail room that made you unwilling to look</p> <p>19 past?</p> <p>20 A. That she was not cooperating, not</p> <p>21 listening, not trying to listen or learn anything.</p> <p>22 And Ms. Howell stated that she was not going to</p> <p>23 train her.</p>
155	104:01 - 104:23	<p>104:01 Q. Why did you say that you felt Ms. Key had</p> <p>02 no intent on changing her hair? Did you ask her?</p> <p>03 A. No, I didn't ask her. But she had had</p> <p>04 every opportunity to change it.</p>

		<p>05 Q. Do you know if she had an appointment that</p> <p>06 she had set coming up to have her hair styled?</p> <p>07 A. Do I personally know?</p> <p>08 Q. Yeah.</p> <p>09 A. No.</p> <p>10 Q. When you said "Rather than let it fester,</p> <p>11 I'm asking that she be moved to another site,"</p> <p>12 what other site were you referring to?</p> <p>13 A. I didn't have one in mind. I don't know</p> <p>14 all of their sites.</p> <p>15 Q. When we look at this, is your email</p> <p>16 address CWilliams@HMMAUSA.com?</p> <p>17 A. At the time it was.</p> <p>18 Q. Is that still your email address?</p> <p>19 A. There's some variations in it. It changed</p> <p>20 maybe about a month ago or less.</p> <p>21 Q. When we had Ms. Key's deposition, there</p> <p>22 was an email that was taped up on the door that</p> <p>23 looked like from you where you still using that</p>
156	105:01 - 105:02	<p>105:01 email address.</p> <p>02 What is your current email address?</p>
157	105:09 - 105:11	<p>105:09 A. Cassandra.Williams.CTR.HEA@HMMAUSA.com.</p> <p>10 Q. Why did your email address change?</p> <p>11 A. It was changed --</p>
158	105:13 - 105:20	<p>105:13 A. I -- I don't know. I honestly don't know.</p> <p>14 It was changed by HMMA. All contractors that have</p> <p>15 an email address on site, their emails have</p> <p>16 changed -- are being changed.</p> <p>17 Q. But at least from 2010, when you started</p> <p>18 working for HEA, through sometime in July or</p> <p>19 August of 2022, your email address was</p> <p>20 CWilliams@HMMAUSA.com?</p>
159	105:22 - 105:22	<p>105:22 A. Correct.</p>
160	106:11 - 106:13	<p>106:11 Q. Do you know why you did not have an HEA</p> <p>12 email address but rather had an HMMAUSA.com email</p> <p>13 address?</p>
161	106:16 - 106:23	<p>106:16 A. I was not -- so when HEA, which was Amco</p> <p>17 at the time when they first started. I had an</p> <p>18 HMMA email address. When I started working for</p> <p>19 Amco, I was not assigned an H- -- or Amco email</p> <p>20 address/HEA email address because I already had</p>



		<p>21 one. When I say "had one," I meant I had an HMMA</p> <p>22 email address.</p> <p>23 Q. Who set up your signature for your</p>
162	107:01 - 107:23	<p>107:01 HMMAUSA.com email address?</p> <p>02 A. I did.</p> <p>03 Q. If we look in that signature line, we see</p> <p>04 the "Team Built, Team Strong" logo.</p> <p>05 What does it say below that?</p> <p>06 A. My signature?</p> <p>07 Q. Yes, ma'am.</p> <p>08 A. "Cassandra Williams, manager of security</p> <p>09 services." Is that what you're referencing?</p> <p>10 Q. Next to that we see a logo that says "Team</p> <p>11 Built, Team Strong."</p> <p>12 A. Yes, I put that in there.</p> <p>13 Q. Okay.</p> <p>14 A. I mean, it was their logo, and I put it</p> <p>15 there.</p> <p>16 Q. And that's an HMMA-used logo; correct?</p> <p>17 A. It was at the time, team -- the team -- I</p> <p>18 mean not -- in 2010 it was not. But I think at</p> <p>19 some point I believe the "Team Built, Team Strong"</p> <p>20 came about.</p> <p>21 Q. But it says -- but the words below "Team</p> <p>22 Built, Team Strong" says "Hyundai Motor</p> <p>23 Manufacturing Alabama"?</p>
163	108:07 - 108:11	<p>108:07 Q. Do you remember where you got the "Team</p> <p>08 Built, Team Strong" logo?</p> <p>09 A. I'm pretty sure I got it off another</p> <p>10 email.</p> <p>11 Q. Is that something you got from HMMA?</p>
164	108:13 - 108:14	<p>108:13 A. It would have been off an email -- an HMMA</p> <p>14 email.</p>
165	108:19 - 108:23	<p>108:19 Q. Okay. And in your signature line, we see</p> <p>20 below your name, it says "Manager of security</p> <p>21 services" and then it says "Hyundai Engineering</p> <p>22 America, Inc.," and then below that "Hyundai Motor</p> <p>23 Manufacturing Alabama LLC."</p>
166	109:01 - 109:02	<p>109:01 What do those words mean? Why are those</p> <p>02 companies in your signature line?</p>
167	109:04 - 109:09	<p>109:04 A. Well, of course, Hyundai Engineering</p>

		<p>05 America, Inc., is my employer. Hyundai Motor</p> <p>06 Manufacturing Alabama is where my assignment is.</p> <p>07 Q. Why would you put the Hyundai Motor</p> <p>08 Manufacturing Alabama, LLC, in your signature</p> <p>09 line?</p>
168	109:11 - 109:11	109:11 A. Because it's where my assignment is.
169	111:02 - 111:05	<p>111:02 Q. Would you agree that using the logo in</p> <p>03 your signature line that says "Hyundai Motor</p> <p>04 Manufacturing of Alabama" could leave the</p> <p>05 impression that you worked for HMMA?</p>
170	111:08 - 111:12	<p>111:08 A. I can't speak to their state of mind.</p> <p>09 Q. Has anyone instructed you that you should</p> <p>10 remove the Hyundai logo -- or the HMMA logo or the</p> <p>11 word "Hyundai Motor Manufacturing Alabama, LLC"</p> <p>12 from your signature line?</p>
171	111:14 - 111:23	<p>111:14 A. At that time or since?</p> <p>15 Q. Since.</p> <p>16 A. Yes. All contractors have been instructed</p> <p>17 to remove it.</p> <p>18 Q. And where did that instruction come from?</p> <p>19 A. My instruction came from general affairs.</p> <p>20 I don't know -- each department, whomever the</p> <p>21 contractor supported, it would come from them.</p> <p>22 But since I support general affairs, that's where</p> <p>23 my instruction came.</p>
172	112:06 - 112:10	<p>112:06 Q. Okay. After you sent the email on</p> <p>07 August 1, 2017, about Ms. Key saying that she is</p> <p>08 absolutely not going to work out, what happened</p> <p>09 next, if anything, as it relates to Ms. Key</p> <p>10 performing work at HMMA?</p>
173	112:13 - 112:17	<p>112:13 A. I was told by Gloria that she was being</p> <p>14 sent to the office.</p> <p>15 Q. When you say "sent to the office," do you</p> <p>16 mean the Dynamic office?</p> <p>17 A. Yes, Dynamic. Sorry.</p>
174	117:18 - 117:21	<p>117:18 Did anybody from Dynamic contact you in an</p> <p>19 effort to investigate Ms. Key's original complaint</p> <p>20 or formal complaint?</p> <p>21 A. No.</p>
175	118:04 - 118:06	118:04 Q. Under the terms of any agreement between

		05 Dynamic and HEA, is that something Dynamic should 06 have reported?
176	118:09 - 118:17	118:09 A. Should have reported to HEA? 10 Q. Yes, ma'am. 11 A. That they were following up on her 12 complaint? 13 Q. Correct. In other words, if Ms. Key is 14 making a complaint that you and an HEA employee 15 have done something that she felt was 16 discriminatory, is that something Dynamic should 17 have reported to HEA?
177	118:19 - 118:23	118:19 A. Since it involved me, I would say so. 20 Q. Did you hear from anybody at HEA who might 21 have been in a supervisory role over you that 22 Ms. Key had filed a formal complaint of 23 discrimination based on things you may have done?
178	119:03 - 119:08	119:03 A. So the complaint that I received from 04 Chris Whitehead I forwarded to my supervisor in 05 our California office. 06 Q. What complaint did you get from Chris 07 Whitehead? 08 A. The EEO- -- a copy of the EEOC.
179	119:10 - 119:10	119:10 THE WITNESS: The one against HMMA, yes.
180	135:16 - 135:18	135:16 Q. Okay. Are the uniforms for security in 17 the mail room people different? 18 A. They are.
181	151:17 - 151:18	151:17 Do you know when Gloria Robinson learned 18 that Ms. Key was pregnant?
182	151:22 - 151:23	151:22 A. She told me she learned on the 31st. 23 Q. Okay. At the time that Ms. Robinson
183	152:01 - 152:03	152:01 expressed to you on the 31st that she didn't think 02 Ms. Key would work out, do you know if at that 03 time Ms. Robinson knew Ms. Key was pregnant?
184	152:07 - 152:07	152:07 A. She did.
185	152:16 - 152:19	152:16 Q. Sure. Did Ms. Robinson express anything 17 to you that led you to conclude Ms. Robinson was 18 unhappy that Ms. Key had not disclosed her 19 pregnancy prior to being hired?
186	152:23 - 152:23	152:23 A. Just her concern is all.

187	153:01 - 153:23	<p>153:01 Q. And what was her concern?</p> <p>02 A. That she wasn't told, and she was</p> <p>03 concerned that -- whether she would be able to</p> <p>04 lift packages and deliver the mail in her stated</p> <p>05 condition.</p> <p>06 Q. Do you know if there have ever been</p> <p>07 pregnant employees who worked in the mail room?</p> <p>08 A. Prior or since?</p> <p>09 Q. Prior to Ms. Key.</p> <p>10 A. Not in with the security. And I can't say</p> <p>11 with 100 percent accuracy, but I -- so one of the</p> <p>12 team members -- HMMA team members that was</p> <p>13 assigned to the mail room -- I just can't remember</p> <p>14 whether she was pregnant during that time or after</p> <p>15 it got turned over to security.</p> <p>16 Q. Okay. Since Ms. Key, has there been</p> <p>17 anybody that was pregnant that's worked in the</p> <p>18 mail room?</p> <p>19 A. Yes.</p> <p>20 Q. And who employed them?</p> <p>21 A. IPSC for one young lady. And the current</p> <p>22 person -- let me see. The current person is</p> <p>23 employed with DSI, but I just -- I can't</p>
188	154:01 - 154:04	<p>154:01 remember -- I believe she was with -- well, I know</p> <p>02 for a fact she was IPSC when we learned she was</p> <p>03 pregnant. And then the contract was awarded to</p> <p>04 DSI, so, of course, she transferred over.</p>
189	155:08 - 155:18	<p>155:08 have been Plaintiff's Exhibit 69. It uses the</p> <p>09 word "employed." In paragraph one it says, "I am</p> <p>10 currently employed with Hyundai Engineering</p> <p>11 America. I was also employed with Hyundai</p> <p>12 Engineering America, Inc., in July and August of</p> <p>13 2017." In paragraph two it reads, "I am not now</p> <p>14 nor have I ever been employed by Hyundai Motor</p> <p>15 Manufacturing Alabama, LLC."</p> <p>16 What did you understand the word</p> <p>17 "employed" to mean as it was used in those two</p> <p>18 photographs?</p>
190	155:20 - 155:22	<p>155:20 A. A direct employee for HMMA.</p> <p>21 Q. And what does that mean to be a direct</p> <p>22 employee?</p>
191	156:01 - 156:02	<p>156:01 A. That I am their employee. They sign my</p>

		02    paycheck or pay me.    I receive benefits.
--	--	--